DFINSEC Filings Trends in ESG Disclosure

September 09, 2021

DFIN provides real-time access to the rapidly changing disclosure landscape

Corporations are beginning to disclose Environmental, Social and Governance (ESG) data in their SEC compliance filings. The SEC recently introduced new disclosure requirements designed to provide stakeholders insight into human capital—from the operating model, to talent planning, learning and innovation, employee experience, and work environment.

EDGAR Pro is the research and benchmarking platform designed to help you uncover intelligence from the rapidly evolving SEC filing landscape.

To stay abreast of this rapidly evolving disclosure landscape, our ESG weekly report, created with EDGAR Pro, provides examples, showing who is currently reporting ESG data to the SEC and how they are incorporating the data into their SEC filings.

Focus on HCM – Human Capital Management disclosures are evolving in support of the SEC Reg S-K Modernization Rule. In this update, we highlight innovative disclosure on Employee Turnover and Talent Management.

HCM EXAMPLE # 1:

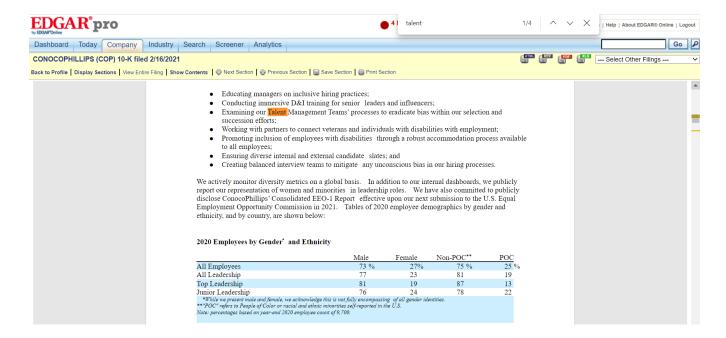
Registrant: ConocoPhillips

Ticker: COP

Topic: Human Capital Management – Talent Management – Employee gender and ethnicity

Document: 10-K

FYE: 12/31/2020



Excerpt for the ConocoPhillips 2021 10-K-

"We actively monitor diversity metrics on a global basis. In addition to our internal dashboards, we publicly report our representation of women and minorities in leadership roles. We have also committed to publicly disclose ConocoPhillips' Consolidated EEO-1 Report effective upon our next submission to the U.S. Equal Employment Opportunity Commission in 2021. Tables of 2020 employee demographics by gender and ethnicity, and by country, are shown below:"

HCM EXAMPLE # 2:

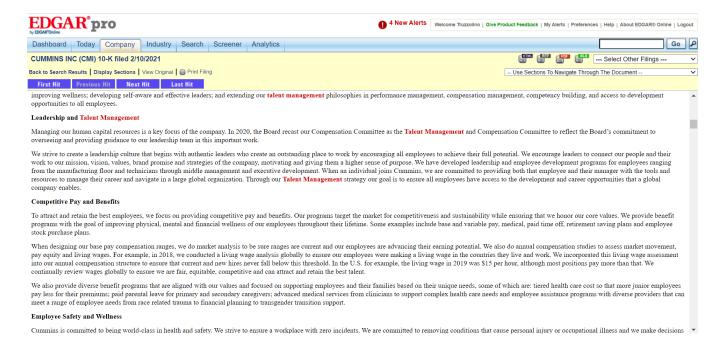
Registrant: Cummins Inc.

Ticker: CMI

Topic: Talent Management – Board Oversight

Document: 10-K

FYE: 12/31/2020



Excerpt for the Cummins Inc. 2021 10-K

"Leadership and Talent Management

Managing our human capital resources is a key focus of the company. In 2020, the Board recast our Compensation Committee as the Talent Management and Compensation Committee to reflect the Board's commitment to overseeing and providing guidance to our leadership team in this important work."

HCM EXAMPLE # 3:

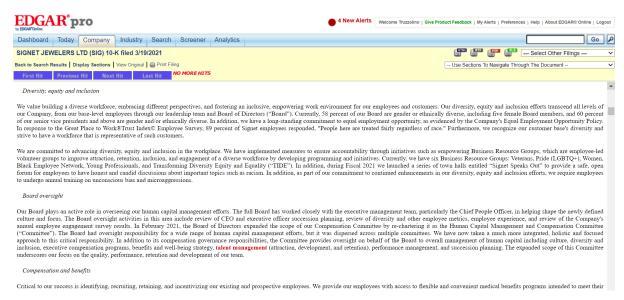
Registrant: Signet Jewelers LTD

Ticker: SIG

Topic: Human Capital and Talent Management – Board Oversight

Document: 10-K

FYE: 12/31/2020



Excerpt from Signet Jewelers LTD 2021 10-K

"Board Oversight

Our Board plays an active role in overseeing our human capital management efforts. The full Board has worked closely with the executive management team, particularly the Chief People Officer, in helping shape the newly defined culture and focus. The Board oversight activities in this area include review of CEO and executive officer succession planning, review of diversity and other employee metrics, employee experience, and review of the Company's annual employee engagement survey results. In February 2021, the Board of Directors expanded the scope of our Compensation Committee by re-chartering it as the Human Capital Management and Compensation Committee ("Committee"). The Board had oversight responsibility for a wide range of human capital management efforts, but it was dispersed across multiple committees. We have now taken a much more integrated, holistic and focused approach to this critical responsibility. In addition to its compensation governance responsibilities, the Committee provides oversight on behalf of the Board to overall management of human capital including culture, diversity and inclusion, executive compensation programs, benefits and well-being strategy, talent management (attraction, development, and retention), performance management, and succession planning. The expanded scope of this Committee underscores our focus on the quality, performance, retention and development of our team."

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